



**Part II** Organizational Action *(continued)*

**17** List the applicable Internal Revenue Code section(s) and subsection(s) upon which the tax treatment is based ▶ \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**18** Can any resulting loss be recognized? ▶ \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**19** Provide any other information necessary to implement the adjustment, such as the reportable tax year ▶ \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Under penalties of perjury, I declare that I have examined this return, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct, and complete. Declaration of preparer (other than officer) is based on all information of which preparer has any knowledge.

**Sign Here**  
Signature ▶ Pete T. Sattelmair Date ▶ 2/10/2026

<b>Paid Preparer Use Only</b>	Print your name ▶	Preparer's signature	Title ▶ <b>PFO/Treasurer</b>	Check <input type="checkbox"/> if self-employed	PTIN
	Print/Type preparer's name		Date		
	Firm's name ▶			Firm's EIN ▶	
	Firm's address ▶			Phone no.	

**AOG - AOG Institutional Fund**  
**Supplemental Attachment to the corrected IRS Form 8937**  
**87-3682413**

---

The amounts shown in the table below represent the Fund's corrected 2025 dividend distributions. At this time, the Fund's earnings and profits are estimated to be in excess of distributions, however should there be any additional quantitative differences from what is currently reported, the Fund will file a corrected Form 8937 pursuant to Treasury Regulation Section 1.6045B-1. These distributions were classified as follows:

<b>CUSIP</b>	<b>Ticker</b>	<b>Record Date</b>	<b>Ex-Dividend Date</b>	<b>Payable Date</b>	<b>Total Distribution Per Share</b>	<b>Non-Dividend Distribution ("ROC") Percentage</b>
00184C200	AOGAX	4/1/2025	4/2/2025	4/3/2025	0.1199	0.00%
00184C200	AOGAX	7/1/2025	7/2/2025	7/3/2025	0.1067	0.00%
00184C101	AOGFX	4/1/2025	4/2/2025	4/3/2025	0.1199	0.00%
00184C101	AOGFX	7/1/2025	7/2/2025	7/3/2025	0.1067	0.00%

This tax status letter is not intended to constitute tax, legal, investment, or other professional advice. This is general information and should not be relied upon for tax purposes. Stockholders should be aware that the tax treatment is subject to change by law in the future or retroactively. Stockholders should consult their tax advisor for tax guidance pertinent to specific facts and circumstances.